



National Rural Electric Cooperative Association

A Touchstone Energy Cooperative



April 29, 2005

The Honorable Karen A. Harbert
Assistant Secretary for Policy
and International Affairs
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

By email: 1605bguidelines.comments@hq.doe.gov

Re: 10 CFR Part 300 Voluntary Greenhouse Gas Reporting, 70 Fed. Reg. 15164 and 15169 (March 24, 2005)

Dear Assistant Secretary Harbert:

The National Rural Electric Cooperative Association (NRECA) respectfully requests a minimum 30-day—but preferably 60-day—extension of the public comment period for the interim final General Guidelines for Voluntary Greenhouse Gas Reporting and the noticed draft Technical Guidelines published March 24, 2005 (70 Fed. Reg. 15164 and 15169).

NRECA is a not-for-profit national service organization representing 930 not-for-profit, customer-owned rural electric cooperatives located in 47 states. NRECA's members serve more than 37 million end-use electric customers. NRECA's membership includes both distribution cooperatives that deliver electricity to the consumer and generation and transmission cooperatives that generate and transmit electricity to distribution co-ops. NRECA's members have participated in the Department of Energy's (DOE) Voluntary Greenhouse Gas Reporting Program since its inception in 1994 and have an interest in revisions to the reporting guidelines.

NRECA also takes part in the Climate VISION program through agreements with the U.S. Department of Agriculture (USDA) and DOE. NRECA participates in a coalition of seven electric power groups that signed a Climate VISION Memorandum of Understanding (MOU) with DOE. The MOU established a voluntary partnership between the DOE and the entire electric power sector as a whole to reduce the sector's greenhouse gas emission intensity by 3 to 5 percent over 10 years and support the President's national goal to reduce the greenhouse gas intensity of the U.S. 18 percent by

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2012. The MOU encourages power sector member companies “to use the 1605(b) program for reporting and registering greenhouse gas emissions intensity reductions achieved under company specific plans” and the Climate VISION program. Consequently, NRECA and our members want the 1605(b) program to be an effective tool supporting Climate VISION.

NRECA appreciates DOE’s and USDA’s many hours of hard work to develop the interim final General Guidelines and draft Technical Guidelines and the subsequent opportunity for the public to submit written comments. We also appreciate the opportunity to present oral views at public workshops on April 26-27 and May 5, 2005. We do, however, have major concerns that the May 23, 2005 deadline for submission of written comments does not provide sufficient time to review, digest, and provide constructive suggestions on 500 pages of extremely technical guidelines. In light of the complexity of the March 24, 2005 General and draft Technical Guidelines, we urge DOE to extend the 60-day public comment period.

The DOE workshop, held April 26-27, highlighted the difficulties that stakeholders have understanding the March 24, 2005 release. At the workshop, DOE officials spent considerable time explaining the technical material, more than originally allotted in the agenda. Participants identified several inconsistencies within the guidelines. While the workshop helped stakeholders develop a better understanding of the interrelation between the General and Technical Guidelines, it only touched the surface.

The DOE/USDA workshop on May 5 will address only the draft Agriculture and Forestry Guidelines. The public will then have just twelve working days to develop comments after the conclusion of the DOE/USDA workshop. This is an insufficient amount of time to prepare substantive written comments that incorporate the information provided at both the workshops. While NRECA will strive to meet the deadlines, we feel that the current schedule does not afford NRECA and its members a fair and meaningful opportunity to provide comments on the highly complex guidelines.

For the above reasons, NRECA requests an extension of the public comment period for the General Guidelines. We request a minimum 30-day—but preferably 60-day—extension to provide comments on the interim final General Guidelines and draft Technical Guidelines. In addition, although DOE should encourage comments by May 23—or 30-60 days later—the comment period for the draft Technical Guidelines should remain open a reasonable time after the close of the comment period. Given the complexity of the draft Technical Guidelines, this will allow commenters an opportunity to change, adjust and expand on their initial comments. Extending the public comment period for the General Guidelines and draft Technical Guidelines will result in a more meaningful opportunity for public comment. The development of workable, revised 1605(b) guidelines is critical to their success.

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NRECA appreciates DOE's hard work in developing the revised General Guidelines for voluntary greenhouse gas reporting and thanks you for considering this request. We look forward to continuing to work with DOE in the development of these revised guidelines.

Sincerely,

A handwritten signature in cursive script that reads "Carol Whitman".

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